DRAFT HAZARDOUS WASTE POST-CLOSURE PERMIT

CITGO PETROLEUM CORPORATION
EPA ID# LAD 008080350
Lake Charles, Louisiana
Calcasieu Parish

Agency Interest# 1250
PER#20000002
Permit Number LAD 008080350-PC-2

I. PERMIT PREAMBLE

This permit is issued to CITGO Petroleum Corporation, Lake Charles Complex, hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

This permit is based on information submitted in the permit application, all subsequent amendments, and on the applicant's certification that such information is accurate and all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

"Administrative Authority" means the Secretary of the Louisiana Department of Environmental Quality or his/her designee (including appropriate assistant secretary).

"Application" refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

"Area of Concern" (AOC) - any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

"Area of Investigation" (AOI) is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

"Beneficial Resource" describes a natural resource that is useful to human and ecological receptors. The state may establish statutes or regulations that identify certain environmental components, such as specific ground water or surface water sources, as a "Special Beneficial Resource," or "Designated Beneficial Resource." The beneficial resource then may be entitled to greater protection from contamination.

"Constituents of Concern" (COC) means the COPC's that pose a significant risk.

"Constituents of Potential Concern" (COPC) means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or a site-specific risk assessment. The facility should compile a list of COPC's for each release site based on existing sampling data, waste analysis reports, etc.

"Conceptual Site Model" (CSM) is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport, exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

"CWA" means Clean Water Act.

"Corrective Action" is an activity conducted to protect human health and the environment.

"Dense Non Aqueous Phase Liquid" (DNAPL) a dense liquid not dissolved in water, commonly referred to as "free product."

"EPA" means the United States Environmental Protection Agency.

"HSWA" means the 1984 Hazardous and Solid Waste Amendments to RCRA.

"Hazardous Constituent" means any constituent identified in LAC 33:V.Chapter 31. Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

"LDEQ" means the Louisiana Department of Environmental Quality.

"Light Non Aqueous Phase Liquid" (LNAPL) a light liquid not dissolved in water, commonly referred to as "free product."

"Operating Record" means written or electronic records of all maintenance, monitoring, inspection, calibration, performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.B.

"Permittee" means Citgo Petroleum Corporation, LA. Highway 108 South, Lake Charles, Louisiana 70602.

"RCRA Permit" means the full permit, with RCRA and HSWA portions.

"RFA" means RCRA Facility Assessment.

"RFI" means RCRA Facility Investigation.

"Release" means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

"SARA" means Superfund Amendments and Reauthorization Action of 1986.

"Solid Waste Management Unit" (SWMU) means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Section II.C of the permit and LAC 33:V.321 are completed.

II. GENERAL PERMIT CONDITIONS

II.A. DURATION OF PERMIT

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

II.B. EFFECT OF PERMIT

This permit authorizes the Permittee to conduct post-closure care activities associated with the Retention/Neutralization Basin and Holding Basin 1 in accordance with the conditions of this permit and LAC 33:V.2911.B. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

II.C. PERMIT ACTIONS

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

II.D. SEVERABILITY

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

II.E. DUTIES AND REQUIREMENTS

II.E.1. Duty to Comply

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

II.E.2. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

II.E.3. Permit Extension

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

II.E.4. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

II.E.5. Duty to Mitigate

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

II.E.6. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

II.E.7. Duty to Provide Information

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit.

II.E.8. Inspection and Entry

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and

II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

II.E.9. Sample Monitoring and Records

II.E.9.a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Sampling and Analysis Plan referenced in Attachment 1.

II.E.9.b. Records of monitoring information shall include:

II.E.9.b(1) the date, exact place, and time of sampling or measurements;

II.E.9.b(2) the name(s) and signature(s) of the individual(s) who performed the sampling or measurements:

II.E.9.b(3) the date(s) analyses were performed;

II.E.9.b(4) the name(s) and signature(s) of the individual(s) who performed the analyses;

II.E.9.b(5) the analytical techniques or methods used;

II.E.9.b(6) the results of such analyses; and

II.E.9.b(7) associated quality assurance performance data.

II.E.9.c. Laboratory Quality Assurance/Quality Control

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

II.E.9.c(1) any commercial laboratory providing analytical results and test data to the Department is required by this permit to be accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by LDEQ.

LAC 33:I. Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by the Department regulations.

This includes, but is not limited to data from RCRA Trial Burns, Risks Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

II.E.9.c(2) If the Permittee decides to use their own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document and submit for approval, quality assurance/quality control procedures that are commensurate with requirements in LAC 33:I. Subpart 3 Laboratory Accreditation.

II.E.9.c(3) For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I Chapter 9. In cases where an approved methodology for a parameter/ analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

II.E.10. Retention of Records

The Permittee shall maintain records from all ground water monitoring wells and associated groundwater surface elevations for the active life of the facility and for the post-closure care period.

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

II.E.11. Notices of Planned Physical Facility Changes

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:B.309.L.1.

II.E.12. Physical Facility after Modification

For a closed unit being modified, the Permittee may not manage hazardous waste in the modified portion of the closed unit until:

II.E.12.a. the Permittee has submitted a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit to and received approval from the Administrative Authority, by certified mail or hand delivery; and

II.E.12.b. the Administrative Authority has inspected the modified unit, following a request to make final inspection by the Permittee, and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

II.E.13. Anticipated Noncompliance

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

II.E.14. Transfer of Permits

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.

II.E.15. Compliance Schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date (LAC 33:V309.L.6).

II.E.16. Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

II.E.17. Non-Emergency Unauthorized Discharge Notification

In accordance with LAC 33:I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E and/or results in contamination of the groundwaters of the state but does not result in an emergency condition, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.18. Unauthorized Discharge to Groundwater Notification

In accordance with LAC 33:I.3919, in the event of an unauthorized discharge resulting in contamination of groundwaters of the state by moving in, into, within or on any saturated subsurface strata, the Permittee shall promptly notify the Department within twenty-four (24) hours after learning of the discharge. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, SPOC in accordance with the procedure and content requirements specified in LAC 33:I.3923.

II.E.19. Written Notification Reports for Unauthorized Discharges

The Permittee shall submit written reports to the SPOC for any unauthorized discharges requiring notification under Conditions II.E.16, II.E.17 or II.E.18 of this permit. The written report shall be submitted in accordance with the procedure and content requirements specified in LAC 33:I.3925.

II.E.20. Noncompliance Reporting

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Condition II.E.16 or Condition II.E.17 of this permit that may endanger the human health or the environment. This report shall include at minimum the following information:

II.E.20.a. information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

II.E.20.b. information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

II.E.20.b(1) name, address, and telephone number if the owner or operator;

II.E.20.b(2) name, address, and telephone number of the facility;

II.E.20.b(3) date, time, and type of incident;

II.E.20.b(4) name and quantity of materials involved;

II.E.20.b(5) the extent of injuries, if any;

II.E.20.b.(6) an assessment of actual or potential to the environment and human health outside the facility, where this is applicable; and

II.E.20.b(7) estimated quantity and disposition of recovered material that resulted from the incident.

II.E.21. Follow-up Written Report of Noncompliance

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment not reported under Condition II.E.19 of this permit. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

II.E.22. Other Noncompliance

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20 of this permit.

II.E.23. Other Information

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

II.E.24. Signatory Requirement

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

II.E.25. Schedule of Compliance

The Permittee shall submit for review and approval by the Administrative Authority, the following items:

II.E.25.a. Within one hundred twenty (120) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority an updated list of SWMU's that includes newly discover SWMU's. The update must also include whether the SWMU's are located in the facility wide RFI, the Surge Pond RFI, or the requested for NFA.

II.E.25.b. Within one hundred and twenty (120) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority revised Figures 3, 4, 4A, 5, 6, 10, and 15 with the correct scale or request the use of an alternate scale in accordance with LAC 33:V.517.B.13.

II.E.25.c. Within sixty (60) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority Security Plan in accordance with LAC 33:V.1507.

II.E.25.d. Within sixty (60) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority an Inspection Plan in accordance with LAC 33:V.1509.

II.E.25.e. Within sixty (60) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority a contingency plan in accordance with the applicable sections of LAC 33:V.Chapter 15 and 29.11.E.

II.E.25.f. Within ninety (90) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority, updated documentation of post-closure care and cost estimates in accordance with LAC 33:V.3709 and 3711.

II.E.25.g. Within ninety (90) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority updated Post-Closure Plans in accordance with LAC 33:V.Chapter 35, Subchapter B.3523 for the permitted units.

II.E.25.h. Within four hundred and sixty (460) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority a report detailing the results of the groundwater biogeochemical study for the use of MNA at the Retention/Neutralization Basin.

II.E.25.i. With ninety (90) day of the effective date of this permit, the Permittee shall submit to the Administrative Authority a work plan for instillation of a down gradient well(s) at the Lube Plant Holding Basin 1.

II.E.25.j. Within sixty (60) days of the effective date of this permit, the Permittee shall submit to the Administrative Authority justification that the test holes were preformed at 200 ft intervals in accordance with LAC 33:V.517.T.3.c.

II.E.26. Additional Operating Standards

(RESERVED)

II.E.27. Updated Documents To Be Submitted Prior To Operation

(RESERVED)

II.E.28. Documents To Be Maintained at Facility Site

II.E.28.a. Until closure is completed and certified by an independent registered professional engineer, the Permittee shall maintain at the facility the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

II.E.28.a(1) Waste Analysis Plan

(RESERVED)

II.E.28.a(2) Personnel Training Plan

(RESERVED)

II.E.28.a(3) Contingency Plan submitted in accordance with LAC 33:V.1513 (see Attachment 1).

II.E.28.a(4) Arrangements with local authorities in accordance with LAC 33:V.1511.G (see Attachment 1).

II.E.28.a(5) Post-Closure Plan submitted in accordance with LAC 33:V.3523 and any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

II.E.28.a(6) Cost estimate for facility post-closure care submitted in accordance with LAC 33:V.3709 and any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

II.E.28.a(7) Operating records

(RESERVED)

II.E.28.a(8) Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

II.E.28.a(9) Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

II.E.28.a(10) Sampling and Analysis Plan developed in accordance with LAC 33:V. Chapter 33 (see Attachment 1).

II.E.28.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

II.E.29. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

II.E.30. Manifest

The Permittee shall report manifest discrepancies and unmanifested waste as required by LAC 33:V.309.L.8 and 9.

II.E.31. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

II.E.32. Waste Discharges

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

II.E.33. Non-Listed Hazardous Waste Facilities

This permit is issued for those hazardous waste facilities listed in Section IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.23 of the General Permit Conditions.

II.E.34. Compliance With Land Disposal Restrictions

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Condition VII and VIII).

II.E.35. Establishing Permit Conditions

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

II.E.36. Obligation for Corrective Action

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

II.E.37. Attachments and Documents Incorporated by Reference

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

III. GENERAL POST-CLOSURE CONDITIONS

III.A. DESIGN AND OPERATION OF THE POST-CLOSURE UNIT

III.A.1. The Permittee must maintain the Retention/Neutralization Basin, Holding Basin 1, and associated structures in a way that minimizes the possibility of a fire, explosion, or any unauthorized sudden or nonsudden release of hazardous waste or hazardous waste constituents to that could threaten human health or the environment.

III.A.2. The Permittee must not manage any new wastes in the Retention/Neutralization Basin, Holding Basin 1, and associated structures.

III.B. REQUIRED NOTICE

(RESERVED)

III.C. GENERAL WASTE ANALYSIS

(RESERVED)

III.D. SECURITY

The Permittee must comply with the security provisions of LAC 33:V.1507, as referenced in Attachment 1.

III.E. GENERAL INSPECTION REQUIREMENTS

The Permittee must follow the Inspection Plan referenced in Condition II.E.28.a(8) and Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509.A and B, and 3523.B.

III.F PERSONNEL TRAINING

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The training shall follow the outline referenced in Attachment 1. The Permittee must maintain all training documents and records as required by LAC 33:V. 1515.D and E.

III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

III.H. LOCATION STANDARDS

III.H.1. The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

III.H.2. The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by LDEQ prior to any hazardous waste and/or hazardous waste units being placed thereon.

III.I. PRECIPITATION RUN-ON AND RUN-OFF

The Permittee must provide for the control by diversion or treatment of run-on and run-off resulting from a rainfall of at least twelve (12) inches, occurring during a period of twenty-four (24) hours in conformity with locally available records of a twenty-four (24) hour rainfall as per LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.2911.

III.J. HURRICANE EVENTS

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

III.K. PREPAREDNESS AND PREVENTION

III.K.1. Required Equipment

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

III.K.2. Testing and Maintenance of Equipment

The Permittee must test and maintain the equipment specified in Section III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

III.K.3. Access to Communications or Alarm Systems

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

III.K.4. Arrangements with Local Authorities

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

III.L. CONTINGENCY PLAN

III.L.1. Implementation of Plan

The Permittee must immediately carry out the provisions of the Contingency Plan, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

III.L.2. Copies of Plan

The Permittee must comply with the requirements of LAC 33:V.1513.C.

III.L.3. Amendments to Plan

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

III.L.4. Emergency Coordinator

The Permittee must comply with the requirements of LAC 33:V.1513.E, and 322.B.6 concerning the emergency coordinator.

III.M. MANIFEST SYSTEM

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 9 and 11.

III.N. RECORD KEEPING AND REPORTING

III.N.1. Operating Record

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, C.

III.N.2. Annual Report

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

III.N.3. Operations Manual

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment, storage, and disposal facilities.

III.O. POST-CLOSURE

III.O.1. Post-Closure Care

The Permittee must manage the Retention/Neutralization Basin and Holding Basin 1 in accordance with this permit, LAC 33:V. Chapter 35, Subchapter B and LAC 33:V.2911.

III.O.2. Amendment to Post-Closure Permit

The Permittee must request modification to this Post-Closure Permit when necessary, in accordance with LAC 33:V.3523.D and LAC 33:V.321.

III.O.3. Post-Closure Maintenance

After final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period specified in LAC 33:V.3521.A.1. The Permittee must maintain all units in post-closure according to the requirements in Condition V.B.

III.O.4. Post-Closure Restrictions

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure care period when access by the public or domestic livestock may pose a hazard to human health.

III.O.5. Post-Closure Property or Site Use

III.O.5.a. Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority finds that the disturbance:

III.O.5.a.(1) is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or

III.O.5.a.(2) is necessary to reduce a threat to human health or the environment.

III.O.5.b. Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

III.O.6. Post-Closure Contact

The Permittee must provide the name, address, and phone number of the person or office to contact about the permitted post-closure units during the post-closure care period.

III.O.7. Certification of Completion of Post-Closure Care

No later than sixty (60) days after completion of the established post-closure care period for the specified unit, the Permittee must submit to the Administrative Authority, by registered mail, a certification that the post-closure care period for the hazardous waste disposal unit(s) was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent registered professional engineer. Within 60 days after receipt of the certification the Administrative Authority will notify the owner or operator that he is no longer required to maintain financial assurance for post-closure care of that unit, unless the Administrative Authority has reason to believe that post-closure care was not conducted in accordance with the approved post-closure plan.

The certification of post-closure care shall include the certification statement found in the LAC 33:V.513.A or the current certification statement in the Louisiana hazardous waste regulations at the time of completion of post-closure care.

III.P. COST ESTIMATE FOR CARE OF THE POST-CLOSURE UNIT

III.P.1. The Permittee must maintain a cost estimate for the permitted and associated structures as required by LAC 33:V.3709.

III.P.2. The Permittee must maintain and adjust the post-closure cost estimate for inflation, as specified in LAC 33:V.3709.B, C, D, and for other circumstances that increase the cost of post-closure.

III.P.3. The Permittee must base all post-closure cost estimates on the assumption that a third party contractor performs post-closure monitoring and maintenance in accordance with LAC 33:V.3709.A.

III.P.4. The Permittee must consider the impact of inventory and process conditions on the any resubmittal of post-closure cost estimate.

III.P.5. During the life of the facility, the Permittee must keep, the latest post-closure cost estimates at the facility, as necessary, to comply with LAC 33:V.3709.D.

III.P.6. Throughout the active life of the facility, the Permittee must adjust and revise its post-closure cost estimates, as necessary, to comply with the provisions of LAC 33:V.3709.

III.Q. FINANCIAL ASSURANCE FOR THE POST-CLOSURE UNITS

Throughout the post-closure care period, the Permittee must provide updates for its financial assurance mechanisms, as necessary, to comply with the provisions of LAC 33:V.3711.

III.R. LIABILITY REQUIREMENTS

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of $1,000,000 each occurrence and $2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of $3,000,000 each occurrence and $6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V. 3715.B.

III.S. INCAPACITY OF THE PERMITTEE

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

III.T. POST-CLOSURE NOTICES

If the Permittee or any subsequent Permittee of the land upon which this hazardous waste disposal unit is located wishes to remove hazardous wastes and hazardous waste residues, the liner or contaminated soils, he must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V, Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V, Subpart 1. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

III.T.1. the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or

III.T.2. the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

IV. PERMITTED CLOSED UNITS

This permit is applicable only to the units known as the Retention/Neutralization Basin and Holding Basin 1, located on the property of CITGO Petroleum Corporation, Lake Charles LA., Calcasieu Parish, Louisiana. This permit also applies to any appurtenances associated with these units. The appurtenances are defined as any run-on/run-off control systems, leachate collection/leak detection systems, tanks, and/or piping and instrumentation associated with these regulated units. If any additional appurtenances are proposed in the future, they will be addressed through a permit modification as required by regulation and this permit.

TABLE 1
INVENTORY AT CLOSURE

UNIT NAME	UNIT TYPE	SURFACE AREA
Retention/Neutralization Basin	Surface Impoundment	107,559 square feet
Holding Basin 1	Surface Impoundment	300,000 square feet

V PERMIT CONDITIONS APPLICABLE TO PERMITTED CLOSED UNITS

V.A. POST-CLOSURE CARE PERIOD

The post-closure care period will be in effect for the period of thirty (30) years, unless extended or shortened by the Administrative Authority, as specified in LAC 33:V.3521.A.1, Length of Post-Closure.

V.A.1. Retention/Neutralization Basin: On January 23, 1997, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

V.A.2. Holding Basin 1: On March 1, 1999, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

V.B. POST-CLOSURE MAINTENANCE

After final closure, the owner or operator must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, Condition III.O of this permit, including maintenance and monitoring throughout the post-closure care period specified in the permit under Condition V.A and LAC 33:V.3521.A.1. The owner or operator must:

V.B.1. For the permitted units, maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events;

V.B.2. for all permitted units, maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of LAC 33:V.Chapter 33;

V.B.3. for all permitted units, manage a run-on and run-off control system to prevent erosion at and other damage to the final cover;

V.B.4. for all permitted units, maintain the cover with a final cover designed, constructed and maintained to:

V.B.4.a. provide long-term minimization of migration of liquids through the surface impoundments,

V.B.4.b. function with minimal maintenance at all permitted units,

V.B.4.c. promote drainage and minimize erosion or abrasion of the final cover at all permitted units,

V.B.4.d. accommodate settling and subsidence, as necessary, so that the cover's integrity is maintained for all permitted units, and

V.B.4.e. have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present at the surface impoundments.

V.B.5. The annual report shall include a Post-Closure activity report for the Retention/Neutralization Basin and Holding Basin 1.

V.C. POST-CLOSURE RESTRICTIONS

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V/1507, during part or all of the post-closure period when access by the public or domestic livestock may pose a hazard to human health.

V.D. POST-CLOSURE USE OF PROPERTY

V.D.1. Post-closure use of property on or in which hazardous waste remain after partial or final closure must never be allowed to disturb the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority find that the disturbance:

V.D.1.a. is necessary to the proposed use of the property and will not increase the potential hazard to human health or the environment; or

V.D.1.b. is necessary to reduce a threat to human health or the environment.

V.D.2. Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

VI. GROUNDWATER PROTECTION

VI.A. APPLICABILITY

The regulations of LAC 33:V, Chapters 3, 5, 15, 29, 33, 35, and 37, and Louisiana Hazardous Waste Control Law Revised Statute R.S., 30:2171 of the Environmental Quality Act, R.S., 30:2001 et seq., and the provisions of this section shall apply to groundwater protection programs at the units identified in Condition IV, Table 1 of this permit. All requirements of this condition must be satisfied and shall apply until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition

III.O.7 of this permit. This includes compliance, closure, and post-closure groundwater monitoring. If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand or continue, assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

VI.B REQUIRED PROGRAMS

The Permittee must continue to conduct the compliance monitoring program per Condition VI.I using all existing systems necessary to comply with monitoring programs specified herein and as stated in the most current approved Sampling and Analysis Plan. The compliance monitoring program must continue until such time as a corrective action program is approved and the permit is modified in accordance with LAC 33:V.321 and 322, as applicable.

All wells and any associated piezometers, described in Table 2 must be maintained, protected from moving equipment, and cannot be abandoned unless exempted from the program at a later date by the Administrative Authority, or unless the integrity of the well or piezometer is threatened. In such case it must be in conformance with a work plan approved by the Administrative Authority. (see condition VI.K – construction and Abandonment of Monitoring Wells and Geotechnical Boreholes) The Permittee must include in the Annual Report revised facility maps, which will show all its monitoring, assessment, compliance, and corrective action wells.

VI.C. GROUNDWATER PROTECTION STANDARD

VI.C.1. The Permittee must comply with conditions specified in this permit that are designed to insure that hazardous waste and hazardous waste constituents do not exceed the concentration limits (see Condition VI.D) in the uppermost permeable zones underlying the waste management areas, beyond or below the points of compliance (see Condition VI.E) during the compliance period (see Condition VI.F). The protection standard does not exempt the Permittee from required corrective action regarding contamination detected by wells not assigned as groundwater compliance points.

VI.C.2. The Permittee must utilize and maintain the present groundwater monitoring system described in this permit.

VI.C.3. The Permittee must adhere to the Sampling and Analysis Plan referenced in Attachment 1.

VI.D. HAZARDOUS CONSTITUENTS, PARAMETERS, ANALYTICAL FREQUENCY AND CONCENTRATION LIMITS

The wells, hazardous constituents, concentration limits and sampling frequency to which the protection standards of LAC 33:V.3305 apply are shown herein in Tables 2 through 4. The Sampling frequency for constituents is noted in Table 2.

The Permittee must continue existing corrective actions or institute corrective actions in all areas associated with the permitted post-closure units and appurtenances where groundwater has been affected by hazardous wastes, hazardous constituents, or parameters exceeding the assigned concentration limits, and implement corrective measures in other areas which may be discovered to exceed these limits in the future.

Table 1 RCRA Units, Point of Compliance and Monitoring Wells, Sampling Frequencies, and Analytical Parameters

Unit Monitored	Facility Well Number	Monitored Zone	Type	Sampling Frequency	Parameters
Lube Plant Retention/ Neutralization Basin	MW-10	A-1 Sand	Upgradient	Semiannual*/ Annual*	TCL VOC-SVOC; TAL Metals/ Table 4 of LAC 33:V.3325
	MW-11	A-1 Sand	Downgradient		
	MW-41	A-1 Sand	Downgradient		
	MW-126	A-1 Sand	Downgradient		
	MW-127	A-1 Sand	Downgradient		
	MW-128	A-1 Sand	Downgradient		
Lube Plant Holding Basin 1	MW-12	A-1 Sand	Downgradient	Semiannual*/ Annual*	TCL VOC-SVOC; TAL Metals/ Table 4 of LAC 33:V.3325
	MW-43	A-1 Sand	Downgradient		
	MW-55	A-1 Sand	Downgradient		
	Proposed Well	A-1 Sand	Downgradient		

*The sampling frequency is one semi-annual event for TCL VOC-SVOC and TAL metals and one semiannual event (annual sampling) for Table 4 of LAC 33.V.3325 for the post-closure monitoring network

Table 2 Groundwater Monitoring Parameters

Parameter	CAS Number	Groundwater Protection Standard**	Estimated Practical Quantitation Limit	Analytical Method***
Specific Conductance*	Not Applicable	Not Applicable	Not Applicable	9050
pH*	Not Applicable	Not Applicable	Not Applicable	9040
Acenaphthene	83-32-9	0.037	0.005	8270
Acenaphthylene	208-96-8	0.1	0.00005	8270
Acetone	67-64-1	0.1	0.005	8260
Anthracene	120-12-7	0.043	0.005	8270
Antimony	7440-36-0	0.006	0.005	6010/7000 Series
Arsenic	7440-38-2	0.01	0.005	6010/7000 Series

Parameter	CAS Number	Groundwater Protection Standard**	Estimated Practical Quantitation Limit	Analytical Method***
Barium	7440-39-3	2	0.005	6010/7000 Series
Benzene	71-43-2	0.005	0.005	8260
Benz(a)anthracene	56-55-3	0.0078	0.005	8270
Benzo(a)pyrene	50-32-8	0.0002	0.005	8270
Benzo(b)fluoranthene	205-99-2	0.0048	0.005	8270
Benzo(k)fluoranthene	207-08-9	0.0025	0.00037	8270
Beryllium	7440-41-7	0.004	0.010	6010/7000 Series
Biphenyl,1,1-	92-52-4	0.03042	0.010	8270
Bis(2-chloroethyl)ether	111-44-4	0.0057	0.010	8270
Bis(2-chloroisopropyl)ether	108-60-1	0.0057	0.003	8270
Bis(2-ethyl-hexyl)phthalate	117-81-7	0.006	0.020	8270
Bromodichloromethane	75-27-4	0.1	0.010	8260
Bromoform	75-25-2	0.1	0.010	8260
Bromomethane	74-83-9	0.01	0.010	8260
Butyl benzyl phthalate	85-68-7	0.73	0.0033	8270
Cadmium	7440-43-9	0.005	0.010	6010/7000 Series
Carbon Disulfide	75-15-0	0.1043	0.005	8260
Carbon Tetrachloride	56-23-5	0.005	0.010	8260
Chloroaniline,p-	106-47-8	0.02	0.005	8270
Chlorobenzene	108-90-7	0.1	0.010	8260
Chloroethane (Ethylchloride)	75-00-3	0.01	0.010	8260
Chloroform	67-66-3	0.1	0.010	8260
Chloromethane	74-87-3	0.01	0.010	8260
Chloronaphthalene,2-	91-58-7	0.04867	0.1	8270
Chlorophenol,2-	95-57-8	0.01	0.2	8270
Chromium(total)	7440-47-3	0.1	0.1	6010/7000 Series
Chrysene	218-01-9	0.0016	0.1	8270
Cobalt	7440-48-4	0.219	0.01	6010/7000 Series
Copper	7440-50-8	1.3	0.5	6010/7000 Series
Dibenz(a,h)anthracene	53-70-3	0.0025	0.5	8270
Dibenzofuran	132-64-9	0.01	0.005	8270
Dibromo-3-chloropropane,1,2-	96-12-8	0.0002	0.00005	8260
Dichlorobenzene,1,2-	95-50-1	0.6	0.005	8260

Parameter	CAS Number	Groundwater Protection Standard**	Estimated Practical Quantitation Limit	Analytical Method***
Dichlorobenzene,1,3-	541-73-1	0.01	0.005	8260
Dichlorobenzene,1,4-	106-46-7	0.075	0.005	8260
Dichlorobenzidine,3,3-	91-94-1	0.02	0.005	8270
Dichloroethane,1,1-	75-34-3	0.08117	0.005	8260
Dichloroethane,1,2-	107-06-2	0.005	0.005	8260
Dichloroethene,1,1-	75-35-4	0.007	0.005	8260
Dichloroethene,cis,1,2-	156-59-2	0.07	0.005	8260
Dichloroethene,trans,1,2-	156-60-5	0.1	0.005	8260
Dichlorophenol,2,4-	120-83-2	0.01095	0.00037	8270
Dichloropropane,1,2-	78-87-5	0.005	0.010	8260
Dichloropropene,cis,1,3-	10061-01-5	0.005	0.010	8260
Diethylphthalate	84-66-2	2.92	0.010	8270
Dimethylphenol,2,4-	105-67-9	0.073	0.003	8270
Dimethylphthalate	131-11-3	36.5	0.020	8270
Di-n-octylphthalate	117-84-0	0.02	0.010	8270
Dinitrophenol,2,4-	51-28-5	0.05	0.010	8270
Dinitrotoluene,2,6-	606-20-2	0.01	0.010	8270
Dinitrotoluene,2,4-	121-14-2	0.01	0.0033	8270
Ethyl benzene	100-41-4	0.7	0.010	8260
Fluoranthene	206-44-0	0.146	0.005	8270
Fluorene	86-73-7	0.02433	0.010	8270
Hexachlorobenzene	118-74-1	0.001	0.005	8270
Hexachlorobutadiene	87-68-3	0.00073	0.010	8270
Hexachlorocyclopentadiene	77-47-4	0.05	0.010	8270
Hexachloroethane	67-72-1	0.01	0.010	8270
Indeno(1,2,3-cd)pyrene	193-39-5	0.0037	0.010	8270
Isophorone	78-59-1	0.0699	0.1	8270
Lead (inorganic)	7439-92-1	0.015	0.2	6010/7000 Series
Mercury (inorganic)	7487-94-7	0.002	0.1	6010/7000 Series
Methylene chloride	75-09-2	0.005	0.1	8260
Methyl ethyl ketone	78-93-3	0.1906	0.01	8260
Methyl isobutyl ketone	108-10-1	0.1993	0.5	8260
Methylnaphthalene,2-	91-57-6	0.0006	0.5	8270
MTBE (methyl tert-butyl ether)	1634-04-4	0.02	0.005	8260
Naphthalene	91-20-3	0.01	0.00005	8270
Nickel	7440-02-0	0.073	0.005	6010/7000 Series
Nitroaniline,2-	88-74-4	0.05	0.005	8270

Parameter	CAS Number	Groundwater Protection Standard**	Estimated Practical Quantitation Limit	Analytical Method***
Nitroaniline,3-	99-09-2	0.05	0.005	8270
Nitroaniline,4-	100-01-6	0.05	0.005	8270
Nitrobenzene	98-95-3	0.0019	0.005	8270
Nitrophenol,4-	100-02-7	0.05	0.005	8270
Nitrosodi-n-propylamine,n-	621-64-7	0.01	0.005	8270
N-nitrosodiphenylamine	86-30-6	0.0135	0.005	8270
Pentachlorophenol	87-86-5	0.001	0.005	8270
Phenanthrene	85-01-8	0.1825	0.00037	8270
Phenol	108-95-2	0.1825	0.010	8270
Pyrene	129-00-0	0.01825	0.010	8270
Selenium	7782-49-2	0.05	0.010	6010/7000 Series
Silver	7440-22-4	0.01825	0.003	6010/7000 Series
Styrene	100-42-5	0.1	0.020	8260
Tetrachloroethane,1,1,2,2-	79-34-5	0.0005	0.010	8260
Tetrachloroethylene	127-18-4	0.005	0.010	8260
Thallium	7440-28-0	0.002	0.010	6010/7000 Series
Toluene	108-88-3	1	0.0033	8260
Trichlorobenzene,1,2,4-	120-82-1	0.07	0.010	8260
Trichloroethane,1,1,1-	71-55-6	0.2	0.005	8260
Trichloroethane,1,1,2-	79-00-5	0.005	0.010	8260
Trichloroethene	79-01-6	0.005	0.005	8260
Trichlorofluoromethane	75-69-4	0.1288	0.010	8260
Trichlorophenol,2,4,5-	95-95-4	0.365	0.010	8270
Trichlorophenol,2,4,6-	88-06-2	0.01	0.010	8270
Vanadium	7440-62-2	0.02555	0.010	6010/7000 Series
Vinyl chloride	75-01-4	0.002	0.1	8260
Xylene(mixed)	1330-20-7	10	0.2	8260
Zinc	7440-66-6	1.095	0.1	6010/7000 Series
1,1,2-Trichloro-1,2,2,-trifluoroethane	76-13-1	5.9	0.1	8260
1,2-Dibromoethane	106-93-4	0.0000053	0.01	8260
2-Hexanone	591-78-6	0.001	0.5	8260
Cyclohexane	110-82-7	1.0	0.5	8260
Dibromochloromethane	124-48-1	0.1	0.005	8260
Dchlorodifluoromethane	75-71-8	0.039	0.00005	8260

Parameter	CAS Number	Groundwater Protection Standard**	Estimated Practical Quantitation Limit	Analytical Method***
Isopropylbenzene	98-82-8	0.066	0.005	8260
Methyl acetate	79-20-9	0.61	0.005	8260
Methylcyclohexane	108-87-2	0.52	0.005	8260
Trans-1,3-Dichloropropene	10061-02-6	0.005	0.005	8260
1,2,4-Trichlorobenzene	120-82-1	0.07	0.005	8260
4,6-Dinitro-o-cresol	534-52-1	0.00037	0.005	8270
4-Bromophenyl phenyl ether	101-55-3	NS	0.005	8270
4-Chlorophenyl phenyl ether	7005-72-3	NS	0.005	8270
Acetophenone	98-86-2	0.061	0.005	8270
Atrazine	1912-24-9	0.003	0.00037	8270
Benzaldehyde	100-52-7	0.061	0.010	8270
Benzo[g,h,i]perylene	191-24-2	0.11	0.010	8270
Bis(2-chloroethoxy) methane	111-91-1	NS	0.010	8270
Caprolactum	105-60-2	1.8	0.003	8270
Carbazole	86-74-8	0.0033	0.020	8270
Di-n-butyl phthalate	84-74-2	0.37	0.010	8270
m-Dichlorobenzene	541-73-1	0.01	0.010	8270
o-Cresol	95-48-7	0.18	0.010	8270
o-Dichlorobenzene	95-50-1	0.6	0.0033	8270
o-Nitrophenol	88-75-5	0.0049	0.010	8270
p-Chloro-m-cresol	59-50-7	0.033	0.005	8270
p-Cresol	106-44-5	0.018	0.010	8270
p-Dichlorobenzene	106-46-7	0.075	0.005	8270
Aluminum	7429-90-5	3.7	0.010	6010/7000 Series
Calcium	7440-70-2	52	0.010	6010/7000 Series
Iron	7439-93-2	0.3	0.010	6010/7000 Series
Magnesium	7439-95-4	21	0.010	6010/7000 Series
Manganese	7439-96-5	0.05	0.1	6010/7000 Series
Potassium	7440-09-7	180	0.2	6010/7000 Series
Sodium	7440-23-5	130	0.1	6010/7000 Series

*As per VI.G.9, pH, temperature, and specific conductance will be measured as standard indicator of groundwater contamination which will be used to indicate well integrity and possible groundwater contamination.

**The Groundwater Protection Standard is the groundwater screening standard as defined by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Document.

***Test Methods for Evaluating Solid Waste Physical/Chemical Methods, Third Edition (EPA Publication Number SW-846, 1986 as amended): must be in accordance with the latest edition of SW-846.

Table 3 Sample Bottle and Preservative Specifications

Parameters	Container Type	Preservation Method
pH	Glass/plastic[1]	Field Measurement
Specific Conductance @ 25° C	Glass/plastic	Field Measurement
Volatiles	2x VOA Vials	Cool to 4° C
Semi-volatiles: Acid Extractables	½ Liter Amber Jar	Cool to 4° C
Temperature	NA	Field Measurement
Priority Pollutant Metals[2]	Glass/plastic	HNO_3 to pH<2, Cool to 4° C

[1] Glass (G) or polyethylene (P) containers.

[2] For soluble metals, filter through a 0.45 micron filter and acidize to pH less than two (2) with HNO_3, then cool to 4° C. For total metals, acidize but do not filter. (See "US EPA RCRA Ground Water Monitoring Technical Enforcement Guidance Document, EPA 530/SW-86 005.")

VI.E. POINT OF COMPLIANCE

The point of compliance (POC) at which the groundwater protection standard of LAC 33:V.3305.A applies, and at which monitoring must be conducted, are the vertical intervals intercepted by the wells identified in Table 2 required by Condition VI.C.2. The horizontal limit of compliance must be the surface following an imaginary line connecting the risers of monitoring wells listed as Point of Compliance wells in Table 2 unless amended through permit modifications by the administrative Authority in the future. The vertical limit of compliance must be the Uppermost Aquifer.

When contamination is detected in the uppermost permeable zone underlying the waste management area, the next vertical aquifer or permeable zone must also be monitored. Since hazardous constituents have been detected at the point of compliance above the groundwater protection standard, the Permittee has entered into the compliance monitoring program.

VI.F. COMPLIANCE PERIOD

The compliance period during which the groundwater protection standard of LAC 33:V.3305.A applies is until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition III.O.7 of this permit. However, if a corrective action program has been implemented, the compliance period can not end until after the Permittee has demonstrated that the corrective action has been effectively implemented and the groundwater protection standard of LAC 33:V.3305.A has not been exceeded for a period of three (3) consecutive years.

VI.G. GENERAL REQUIREMENTS

VI.G.1. The Permittee's groundwater monitoring system for the previously identified hazardous waste management facilities must consist of all wells as listed in Table 2, unless changed in the future by the Administrative Authority through permit modification.

VI.G.2. The Permittee must maintain the structural and mechanical integrity of all wells and provide protection from accidental damage and surface infiltration, as well as implement a monitoring well inspection schedule. A written report on damage to any well must be submitted to the Administrative Authority in accordance with Condition II.E.21 of this permit.

VI.G.3. Up-gradient wells must always yield groundwater samples from the uppermost water bearing zone that are representative of groundwater that has not been affected by possible leakage from the waste management units. Downgradient and vertical point of compliance wells must yield groundwater samples from the water bearing zones that represent the quality of groundwater beneath the facilities that flows to the points of compliance.

VI.G.4. The Permittee must conform to the sampling and analysis requirements listed in Condition VI.C and as required by LAC 33:V.3315.

VI.G.5. Each well must be measured for total depth and depth and depth to water on the same day and prior to purging. Measurements must be to the nearest 0.1 foot, and the values must be recorded in the field notebook and reproduced and submitted in the Ground water Annual Report. If 10% of the screening interval is blocked by sediments, the well must be redeveloped prior to the next sampling event.

VI.G.6. Each well must be purged by evacuation to dryness or by removing a minimum of three casing volumes. The wells must be sampled immediately upon purging and/or when sufficient water for sampling has recharged the well. Other techniques (e.g., micro-purging) must be approved by the Administrative Authority prior to use in monitoring or corrective action programs. (Micro-purging may be allowed with the approval of the Administrative Authority.) Purging methods must be consistent throughout the life of the permitted closed unit.

VI.G.7. Samples must be withdrawn using dedicated or adequately cleaned equipment for each well. No equipment or method may be used that will chemically alter or influence the sample. Sampling devices other than bailers must be approved by the Administrative Authority prior to use in monitoring or corrective action programs. Care must be taken to avoid placing clean sampling equipment on the ground or on any contaminated surface. Sampling methods and equipment must be compatible throughout the life of the permitted closed unit.

VI.G.8. Groundwater samples shall be monitored and analyzed for turbidity. Samples containing less than five (5) NTU (nephelometric turbidity unit) are acceptable for analysis when the analytical method is sensitive to turbidity (such as the analysis of metals). Samples containing greater than five (5) NTU are only acceptable when well development is certified by a qualified geologist as "the best obtainable". An evaluation of turbidity must accompany all potentially affected analytical values.

VI.G.9. The Permittee must measure pH and specific conductance as standard indicators of groundwater contamination, which will be used to indicate well integrity and possible groundwater contamination. The results of these analyses must be recorded in the field log book and interpreted.

VI.G.10. A chain of custody protocol must be employed that will allow for tracking possession and handling of samples from the time of collection through laboratory analysis. All sample containers must be labeled to prevent misidentification, have proper seals, and indicate the test parameters required.

VI.G.11. Sample preservation, handling and analysis must meet of the specifications of LAC 33:V.3315.D and E and Test Methods for Evaluating Solid Waste Physical/Chemical Methods 3rd. Edition (EPA Publication Number SW-846, as amended) or an equivalent substitute (approved by the Administrative Authority prior to implementation). Containers, preservation methods and analytical limits are listed in Table 3 and Table 4 of this permit.

VI.G.12. The Permittee must use RECAP Screening Standards (SS) outlined in the approved facility Sampling and Analysis Plan in determining whether background values or concentrations have been exceeded for the parameters listed Table 3.

VI.G.13. Records of all sampling and analytical work must be maintained at the site during the life of the facilities, including post-closure care periods. An up-to-date field log book (or compilation of field sheets) must be kept at the site which documents (for each sample) the well identification number, total well depth, elevation of top of casing, water level, water color (visual), well evacuation procedures and equipment, sample withdrawal procedures and equipment, date, time sample identification numbers, field measurements (pH, specific conductance, etc.) and methods, name of collector, field observations, calculations of the standing water volume in the well, and the total volume evacuated.

VI.G.14. An annual groundwater report must be submitted each year no later than March 1, as required by LAC 33:V.1529.D.8. This report must summarize all groundwater activities for the preceding calendar year including an evaluation of the monitoring strategy in relation to the direction of groundwater flow and locations of wells associated with the facilities. Reports shall include a signed and dated certification by the project manager that monitoring events were complete in accordance with appropriate QA/QC; laboratory analytical and QA/QC reports for each sampling event (may be submitted in electronic format); completed chain-of-custody forms and field data sheets for each sampling event; documentation of the disposition of purge water, including manifest (if applicable); the Groundwater Monitoring Well Characteristics Form (RECAP Form 5) and the Groundwater Monitoring Well Sampling Event Summary (RECAP Form 6). Applicable calculations must also include groundwater flow contaminant migration rates (as applicable), direct comparison of the results to applicable RECAP standards in tabular format, a tabular summary by well of historical groundwater data for each detected constituent that includes a minimum of the last 8 quarters of sampling data, and any other information as it regards corrective actions required by this permit.

VI.H DETECTION MONITORING PROGRAM

RESERVED (Permittee is currently in the Compliance Monitoring Program as per Condition VI.I)

Any downgradient wells that become contaminated, but eventually produce groundwater samples with analytical results below the permitted concentration limits for monitored constituents for at least three (3) years as the result of a corrective action program, may be re-scheduled for detection monitoring on a schedule approved by the Administrative Authority.

VI.I. COMPLIANCE MONITORING

The Permittee must conduct a compliance monitoring program in accordance with LAC 33:V.3319 whenever hazardous waste constituents are confirmed in any monitoring well.

VI.I.1. The Permittee must determine the concentration of each hazardous constituent listed in the approved Sampling and Analysis Plan at least semi-annually during compliance monitoring periods (from groundwater in the wells required by Section VI.C.2). At least annually the Permittee must analyze samples from all monitoring wells at the compliance points for all constituents listed in LAC 33:V.3325, Table 4, to determine whether additional hazardous constituents are present in the Uppermost Aquifer (and, if so, at what concentration), pursuant to procedures of this permit. If the Permittee finds LAC 33:V.3325, Table 4 constituents in the groundwater that are not already identified in the permit as monitoring constituents, the Permittee may re-sample within one month and repeat LAC 33:V.3325, Table 4 analysis. If the second analysis confirms the presence of new constituents, the Permittee must report the concentrations of these additional constituents to the Administrative Authority within seven days after the completion of the second analysis and add them to the monitoring list. If the Permittee chooses not to re-sample, then he or she must report the concentrations of these additional constituents to the Administrative Authority within seven days after completion of the initial analysis and add them to the monitoring list.

VI.I.2. If the Permittee determines, pursuant to LAC 33:V.3319.D, 3321.C, and Section VI.C that any concentration limits under LAC 33:V.3309 are being exceeded at any monitoring well at the point of compliance, he must:

VI.I.2.a. notify the Administrative Authority of this finding in writing within seven (7) days. The notification must indicate which concentration limits have been exceeded and list the contaminants and concentrations; and

VI.I.2.b. submit, to the Administrative Authority, an application for a permit modification to establish or modify corrective action programs meeting the requirements of LAC 33:V.3321 within 180 days, or within ninety (90) days if a certified engineering feasibility study has been previously submitted to the Administrative Authority under LAC 33:V.3317.G.5.b. The application must include the following information:

VI.I.2.b(1) a detailed description and schedule for assessment and corrective actions that will achieve compliance with the groundwater protection standard specified in Section VI.D of this permit under LAC 33:V.3319.A; and

VI.I.2.b(2) a geotechnical plan (certified by a qualified geologist or a geotechnical engineer) to demonstrate the effectiveness of the planned corrective actions. This plan may incorporate the compliance monitoring program developed to meet the requirements of this permit, except that the Permittee will be required to monitor as frequently as necessary (as required in Section VI.J.1) to assure that sufficient data will be generated for demonstrating the effectiveness of the corrective actions.

VI.I.2.c. If the Permittee determines, pursuant to LAC 33:V.3319.D, that the groundwater concentration limits under Section VI.D are being exceeded at any monitoring well at the point of compliance, he or she may demonstrate that a source other than a regulated unit caused the contamination, or that the detection is an artifact caused by an error in sampling, or natural variation in the groundwater. In making a demonstration under this Condition, the Permittee, must:

VI.I.2.c(1) notify the Administrative Authority in writing within seven days that he or she intends to make a demonstration under this condition;

VI.I.2.c(2) within 90 days, submit a report to the Administrative Authority which demonstrates that a source other than a regulated unit caused the standard to be exceeded or that the apparent noncompliance with the standards resulted from an error in sampling, analysis or evaluation;

VI.I.2.c(3) within 90 days, submit to the Administrative Authority an application for a permit modification to make any appropriate changes to the compliance monitoring program at the facility; and

VI.I.2.c(4) continue to monitor in accord with the compliance monitoring program established under this Permit.

VI.I.2.d. If the Permittee determines that the compliance monitoring program no longer satisfies the requirements of this permit, he or she must, within 90 days submit an application for a permit modification to make any appropriate changes to the program.

VI.I.3. The following additional conditions shall apply:

VI.I.3.a. The plume must be defined by assessment wells, which are to be sampled according to a frequency approved by the Administrative Authority as part of a compliance monitoring program for constituents specified in Section VI.D, Table 2 to satisfy LAC 33:V.3315.A.3.

VI.I.3.b. Plume defining wells are wells present or proposed for installation immediately outside the extent of the plume and serve the purpose of insuring detection of any enlargement of the plume. Section VI must be updated to include any newly identified constituents contained in LAC 33:V.3325.Table 4 as required by LAC 33:V.3319.G. If the plume defining wells are found to contain constituents above the practical quantitation limit (PQL) levels specified in Section VI, Table 2, then the Permittee must submit a plan to perform an additional assessment to identify the full extent of the plume.

VI.J. CORRECTIVE ACTION PROGRAM

The Permittee currently has a Corrective Action Program for groundwater contamination as a result of operations related to past or present hazardous waste management facilities identified in Condition VI.A of this permit. The Permittee must continue or expand the Corrective Action Program in accordance with the requirements of LAC 33:V.3321 and as subsequently directed by the Administrative Authority. Water quality sampling, water level measurements and the general compilation of data to demonstrate the effectiveness of existing and new corrective action programs must be made until compliance with groundwater protection standards is achieved for at least three (3) years or until this requirement is terminated in writing by the Administrative Authority (after the data indicates adequate control of contaminant migration and concentration increases).

VI.J.1. The Permittee must evaluate and report the effectiveness and progress of the corrective action semi-annually to the Administrative Authority as required by LAC 33:V.3321.G. and in accordance with Condition VI.L.1.j. The evaluation shall include the following:

VI.J.1.a. general discussion on the effectiveness of the corrective action in controlling the source of release and protecting human health and the environment, and progress being made toward completion;

VI.J.1.b. trend analysis and updated schedule for completion of the corrective action;

VI.J.1.c. evaluation of performance reliability, ease of implementation and any encountered concerns or problems;

VI.J.1.d. any changes to surrounding land use or environmental receptors that may impact effectiveness;

VI.J.1.e. recommendations for improvement;

VI.J.1.f. recovered amounts for each component of a recovery system (e.g., recovery wells, French drain systems, etc.) and the entire system; recovered amounts for both contaminants and all liquids; recovered amounts for both the reporting period and since recovery implementation; and

VI.J.1.g. graphical and statistical analyses, as necessary, to demonstrate the effectiveness and progress (the Administrative Authority may also require predictive computer modeling, as per LAC 33:V.3303.D.).

VI.J.2. Plume defining wells are wells present or proposed for installation along the perimeter of the plume and serve the purpose of insuring detection of any enlargement of the plume.

VI.J.2.a. The plume defining wells as listed in Table 2 must be sampled according to a frequency approved by the Administrative Authority, as part of the on-going evaluation of the corrective action program, for constituents specified in Table 4 to satisfy LAC 33:V.3315.A.3.

VI.J.2.b. If the Permittee determines that there is statistically significant evidence of contamination for chemical parameters or hazardous constituents at any plume defining wells previously reported as non-detect, the Permittee must notify the Administrative Authority of the finding in writing within seven days. This notification must indicate what chemical parameters or hazardous constituents have shown statistically significant evidence of contamination. Further, the Permittee must do one of the following:

VI.J.2.b.(1) Submit an application for a permit modification to the Administrative Authority within 90 from the date of the confirmation of contamination. The application must include a plan to perform an additional assessment to identify the full extent of the plume and propose any changes necessary to the corrective action to achieve the groundwater protection standard. The application shall include any proposed changes to the groundwater monitoring system, monitoring frequency, sampling and analysis procedures and methods, and/or statistical methods; or

VI.J.2.b.(2) Demonstrate that a source other than a regulated unit caused the contamination or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater. The Permittee may make a demonstration under this Paragraph in addition to, or in lieu of, submitting a permit modification application; however, the Permittee is not relieved of the requirement to submit a permit modification application within the time specified unless the demonstration made under this Paragraph successfully shows that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. In making a demonstration under this Paragraph the Permittee must:

VI.J.2.b.(2)(a) Specify the Permittee's intention to make a demonstration under this Paragraph when notifying the Administrative Authority of the statistically significant evidence of contamination;

VI.J.2.b.(2)(b) Within 90 days, submit a report to the Administrative Authority that demonstrates that a source other than a regulated unit caused the contamination or that the contamination resulted from error in sampling, analysis, or evaluation. Further, the Permittee must submit an application for a permit modification to make any appropriate changes to the monitoring program; and

VI.J.2.b.(2)(c) Continue to monitor in accordance with the monitoring program established under this permit.

VI.J.3. If the Permittee determines that the corrective action program (including monitoring) no longer satisfies the requirements of this permit, the Permittee, within 90 days, shall submit an application for a permit modification to make any appropriate changes to the program.

VI.K ABANDONMENT OF MONITORING WELLS AND GEOTECHNICAL BOREHOLES

The Permittee must provide for the sealing of any vertical migration path resulting from exploratory boring, leachate collection or detection systems and/or groundwater monitoring programs as provided in LAC 33:V.3323, and follow abandonment procedures conforming to the standards and guidelines specified in "CONSTRUCTION OF GEOTECHNICAL BOREHOLES AND GROUNDWATER MONITORING SYSTEMS HANDBOOK", dated May 1993 ("Construction Handbook", May 1993). This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245. A work plan for the plugging and abandonment of a well must be submitted for approval by the Administrative Authority, whenever such migration pathways are discovered. Upon completion of well abandonment, a copy of DOTD-GW-2, Louisiana Department of Transportation and Development Well Plugging and Abandonment Form, must be submitted to the Administrative Authority.

HAZARDOUS AND SOLID WASTE AMENDMENTS

VII. SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) TO RCRA

HSWA requirements are a site-wide corrective action program. Therefore, the HSWA conditions for the RCRA Hazardous Waste Post-Closure Permit for the Retention/Neutralization Basin and Holding Basin 1 (HB-1) (LAD 008 080 350-PC-2), shall be reflective of the HSWA conditions of the RCRA Hazardous Waste Post-Closure Renewal Permit for the South Sludge Pond (LAD 008 080 350-PC-RN-1), effective June 23, 2006.

ATTACHMENT 1

ATTACHMENT 1
LIST OF FACILITY DOCUMENTS INCORPORATED
IN THE PERMIT BY REFERENCE
LAD008080530
AI#1250

DOCUMENT TYPE	APPLICATION/DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Financial Assurance	03/30/2006	35676851	
Post-Closure Cost Estimates	NA	NA	Updated Post-Closure cost estimates shall be submitted in accordance with II.E.21.f.
Post-Closure Plan	NA	NA	Updated Post-Closure Plans shall be submitted in accordance with II.E.21.g.
Groundwater Monitoring Plan/Sampling Analysis Plan	10/13/2006	34747319	
Contingency Plan	NA	NA	Contingency Plan shall be submitted in accordance with II.E.21.e.
Inspection Plan	NA	NA	Inspection Plan shall be submitted in accordance with II.E.21.d.
Security Plan	NA	NA	The Security Plan shall be submitted in accordance with II.E.21.c.